



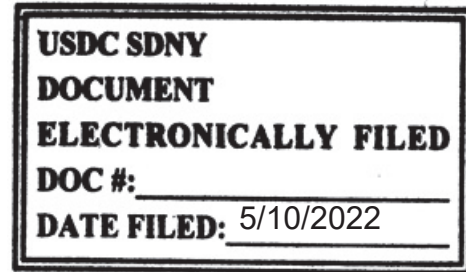
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VIA ECF

May 6, 2022

Hon. Magistrate Judge Robert W. Lehrburger
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Claimant: Flores v. Commissioner of Social Security
Case #: 1:21-cv-08109-RWL

Dear Judge Lehrburger:

This matter was filed on September 30, 2021 (Dkt 1). Pursuant to your Order on March 14, 2022, which reset deadlines, Plaintiff was to serve a written proposal by April 10, 2022 and a Joint Letter was to be filed by May 10, 2022. Plaintiff's motion will be due by June 10, 2022.

Christopher D. Latham, the initial attorney for the Plaintiff in this matter recently retired and his assistant left the firm shortly after filing the request for an extension. I am the only attorney in my firm handling Federal Court matters at this time. Requests for termination on all cases where Mr. Latham is the attorney of record are being prepared and submitted. Currently there are over 130 cases pending and I have approximately 35 motions due within the next two months. The Certified Administrative Record in this case consists of 17 parts and is comprised of over 2,000 pages.

Please accept this letter as Plaintiff's request a 10 day extension of time to serve a written proposal making it due May 19, 2022 and 21 day extension to serve a Joint Letter making it due June 9, 2022. I would like to ask for an additional 10 days to file Plaintiff's motion as well making it due June 20, 2022 along with providing the Defendant an additional 10 days to file a cross motion, making it due August 20. I contacted Defense counsel today and he consented to an extension.

Thank you kindly for your consideration.



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Very truly yours,

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Extension granted.

SO ORDERED:

5/10/2022 

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE